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I. Purpose and Scope

This Item provides information and guidance to State agencies, departments, and public authorities regarding a requirement connected with all applications for Federal funds, effective October 1, 2003.

II. Overview

Pursuant to the Federal Financial Assistance Management Improvement Act of 1999 (Public Law 106-107), on June 27, 2003, the U.S. Office of Management and Budget (OMB) published in the *Federal Register* a Notice of Final Policy Issuance concerning the “Use of a Universal Identifier by Grant Applicants,” which can be found at:

http://www.whitehouse.gov/omb/fedreg/062703_grant_identifier.pdf

This Federal policy directive stipulates that, with rare exceptions, **as of October 1, 2003 any applicant for Federal grants or cooperative agreements under discretionary and mandatory grant programs or activities must include a Data Universal Numbering System (DUNS) number in their application to the Federal government.** Without a DUNS number, such applications are likely to be rejected. DUNS numbers are issued by, owned by, and permanently maintained by Dun & Bradstreet (D&B).

III. Background

A DUNS number is a unique nine-digit identification number randomly generated by D&B. All state governments currently have numerous DUNS numbers which have been established for them by D&B in the normal course of the conduct of state business. Sometimes governmental entities have requested DUNS numbers. It appears that more often, these numbers were assigned by D&B, which gathers data about organizations from a wide variety of information sources such as agency websites, tax records, and the Yellow Pages. D&B sells this information but advises that they collect only public information, including the names, work telephone numbers, and locations of public employees, but not their personal information.

For many years, the Federal government required that governmental entities supply DUNS numbers in connection with contracts with the Federal government. Under this OMB directive, DUNS numbers are now required in connection with applications for Federal grants or cooperative agreements under discretionary and mandatory grant programs, **including those under formula, entitlement, and block grant programs.**

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(Information is not yet available as to how DUNS numbers will become associated with Federal programs for which Federal cash flows to the State but for which no applications are submitted by the State.)

OMB's stated purpose for this DUNS requirement is that "there is a need for improved statistical reporting of Federal grants and cooperative agreements. Use of the DUNS number government-wide will provide a means to identify entities receiving those awards and their business relationships. The identifier will be used for tracking purposes, and to validate address and point of contact information . . . OMB is working to ensure that, for applications subject to the DUNS number requirements, Federal grant financial reporting, payment, and audit requirements are modified to also incorporate use of the DUNS number. It is OMB's intent to expand use of the DUNS number throughout the entire grants life cycle . . . This policy is also designed to further implement the E-grants.gov initiative, one of the 24 electronic government (E-Gov) initiatives under the President's Management Agenda."

DUNS numbers are required for Federal Single Audits. Noncompliance may lead to an audit finding

Accordingly, it is important that State government agencies meet this requirement in a consistent manner, establishing controls as necessary and maintaining accurate records, in preparation for responding appropriately to forthcoming Single Audit and other Federal requirements as they become known.

IV. Initial Steps

In the absence of more specific instructions from OMB, it is recommended that agencies take the following steps:

1. **Centralize the DUNS function:** Decide where in the agency to centralize the application for, and management of, DUNS numbers for purposes of Federal funds, whether in the budget or finance office, or with the agency's Single Audit contact.
2. **Choose an agency-specific DUNS number:** It is recommended that each agency use one DUNS number assigned specifically to the agency, for all applications for Federal grants or cooperative agreements. Very likely each agency already has one or more DUNS numbers from which to choose; the agency's main DUNS number would probably be most appropriate. If the agency does not have a DUNS number, it will be necessary to apply for one. **Choosing an appropriate existing DUNS**

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number, or obtaining a new DUNS number if necessary, is the responsibility of each agency that applies for Federal funds or cooperative agreements.

To learn whether your agency has DUNS numbers, and if so, what the main DUNS number is, or to request a DUNS number if your agency does not already have one, call any of the following D&B telephone numbers:

- Customer Service (recommended for initial contacts) 800-234-3867
- Dedicated DUNS Number Request Line: 866-705-5711

Exception: If your agency has previously negotiated the use of DUNS numbers with your Federal cognizant agency for purposes of Federal grants or cooperative agreements, you may continue using those DUNS numbers.

State agencies will be responsible for the accuracy of DUNS numbers included in the State’s Single Audit, as will public authorities which have elected to be covered by the State’s Single Audit. While State agencies may currently have numerous DUNS numbers assigned to them, this Item deals only with those numbers specifically used by State agencies in connection with applications for Federal grants and cooperative agreements. There should be no charge for acquiring an agency’s DUNS information from D&B.

Be aware that DUNS numbers and related data are compiled by D&B into marketing lists and sold. **If you have to apply for a DUNS number and do not want your agency information related to your Federal funds DUNS number to be included in D&B marketing lists, tell the D&B telephone representative that you want to be “de-listed” from the D&B marketing file.**

3. **Use the “ultimate” New York State DUNS number, if necessary:** If a Federal agency requests that you also include the existing overall New York State DUNS number in your applications for Federal funds, use **041002973**.

Exception: It appears that the New York State “ultimate” DUNS number is not applicable to most or all State public authorities, each of which may have its own “ultimate” DUNS number. D&B Customer Service can be especially helpful if authorities want to learn how many DUNS numbers are assigned to their organizations, and what their “ultimate” DUNS number is.

4. **Notify your budget examiner of the name, phone number, and e-mail address of your agency’s DUNS contact.**

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5. **Manage DUNS information for Single Audit and possible other future Federal purposes:** Ensure that all applications for Federal grants and cooperative agreements filed by anyone in your agency include the one DUNS number chosen by your agency for this purpose, and the “ultimate” New York State DUNS number, if required. Keep adequate records to ensure that the agency-specific DUNS number can be appropriately reflected in Single Audits.

The Division’s DUNS contact may be reached directly by contacting the Expenditure/Debt Unit at 518-474-2302. DUNS questions relating to payments of Federal funds or financial reports developed by the New York State Office of the State Comptroller should be directed to the Bureau of Accounting Operations at 518-474-4017.